

EXHIBIT C

REDACTED

Topic ¹	Google's Proposal <u>(Prior Searches Identified Below Plus:)</u>	Plaintiffs' Proposal
Web & App Activity (WAA) (pages 2–4)		
Google Analytics (GA) for Firebase (page 5)	--	--
Google's Public Representations and Consent Defense (page 6–7)		
Storage and Use of Data (pages 8–9)		
Other Products (AdMob, FCM, RTB, App Indexing, GMS) (pages 10–13)		
Total²	Prior Searches Plus:	

¹ The parties have been discussing search terms by topic, and this list of terms follows those topics.

² Because multiple searches can return the same document, calculated “totals” throughout this exhibit are less than numeric totals of the search terms within each topic. In other words, these totals and those highlighted in yellow represent the total number of additional documents for review *after* accounting for documents that contain multiple search terms.

Web & App Activity (WAA)

Terms Google has agreed to run and review, and where responsive, to produce (divided by custodian where applicable):

All Documents Produced in the *Arizona v. Google LLC*, No. CV 2020-006219 (Ariz. Super. Ct. 2020) matter (including David Monsees's custodial files) see ECF No. 85:

- “WAA”
- “WAAH”
- “web and app activity”
- (Web pre/2 “App Activity”)

All custodians:

- “allow Google to save”
- “activities and info you allow Google to save”
- “your searches and activity”
- WSH

Non-WAA custodians (Ganem, Ma, Weng, Hansen)³:

- WAA*
- W&AA*
- sWAA
- “Web/App”
- web* /3 app*
- “web history”
- “app activity”
- “activity controls”
- “your Google Account”
- Web pre/2 “app activity”
- UDC
- “User Data Controls”

WAA custodian (Monsees)⁴:

- (“WAA” or “WAAH” or “WAAs” or “sWAA” or “W&AA” or “W&AAs” or “web history” or “WHSH” or (Web pre/2 “App Activity”)) /50 disclos*
- (“WAA” or “WAAH” or “WAAs” or “sWAA” or “W&AA” or “W&AAs” or “web history” or “WHSH” or (Web pre/2 “App Activity”)) /50 “your activity”

³ Google employed these terms for custodians whose job responsibilities do not include Web & App Activity (WAA), including Steve Ganem (GA for Firebase Product Lead), Francis Ma (Firebase SDK product executive), Edward Weng (AdMob Product Manager, former), and Todd Hansen (Firebase Cloud Messaging software engineer).

⁴ Google employed these terms for David Monsees, Google’s WAA product manager.

Web & App Activity (WAA)

- (“WAA” or “WAAH” or “WAAs” or “sWAA” or “W&AA” or “W&AAs” or “web history” or “WHS” or (Web pre/2 “App Activity”)) /50 or analytics
- (“WAA” or “WAAH” or “WAAs” or “sWAA” or “W&AA” or “W&AAs” or “web history” or “WHS” or (Web pre/2 “App Activity”)) /50 scion
- (“WAA” or “WAAH” or “WAAs” or “sWAA” or “W&AA” or “W&AAs” or “web history” or “WHS” or (Web pre/2 “App Activity”)) /50 function*
- (“WAA” or “WAAH” or “WAAs” or “sWAA” or “W&AA” or “W&AAs” or “web history” or “WHS” or (Web pre/2 “App Activity”)) /50 firebase
- (“WAA” or “WAAH” or “WAAs” or “sWAA” or “W&AA” or “W&AAs” or “web history” or “WHS” or (Web pre/2 “App Activity”)) /50 “event data”
- (“WAA” or “WAAH” or “WAAs” or “sWAA” or “W&AA” or “W&AAs” or “web history” or “WHS” or (Web pre/2 “App Activity”)) /50 “measurement data”
- (“WAA” or “WAAH” or “WAAs” or “sWAA” or “W&AA” or “W&AAs” or “web history” or “WHS” or (Web pre/2 “App Activity”)) /25 consent
- (“WAA” or “WAAH” or “WAAs” or “sWAA” or “W&AA” or “W&AAs” or “web history” or “WHS” or (Web pre/2 “App Activity”)) /25 benefits
- (“WAA” or “WAAH” or “WAAs” or “sWAA” or “W&AA” or “W&AAs” or “web history” or “WHS” or (Web pre/2 “App Activity”)) /25 “data collection”
- (“WAA” or “WAAH” or “WAAs” or “sWAA” or “W&AA” or “W&AAs” or “web history” or “WHS” or (Web pre/2 “App Activity”)) /25 “privacy policy”
- (“WAA” or “WAAH” or “WAAs” or “sWAA” or “W&AA” or “W&AAs” or “web history” or “WHS” or (Web pre/2 “App Activity”)) /10 plan*
- (“WAA” or “WAAH” or “WAAs” or “sWAA” or “W&AA” or “W&AAs” or “web history” or “WHS” or (Web pre/2 “App Activity”)) /10 feature
- (“WAA” or “WAAH” or “WAAs” or “sWAA” or “W&AA” or “W&AAs” or “web history” or “WHS” or (Web pre/2 “App Activity”)) /10 launch

Web & App Activity (WAA)

Disputed Search Term Proposals:

No. ⁵	Google's Proposal	Plaintiffs' Proposal	
	<i>Prior Searches Plus:</i>		<i>Prior Searches Plus:</i>
1		*WAA* ⁶ (Run as: “sWAA” OR WAA*) (Monsees)	
2	“Web/App” (Monsees)		“Web/App” (Monsees) ⁷
3	“W&A” OR “W&AA” OR “W&AAs”		W&A* (Run as: “W&A” OR “W&AA” OR “W&AAs”)
4	“web history” (Monsees)		“web history” (Monsees)
5	Web /2 “app activity” (Monsees)		Web /2 “app activity” (Monsees)
6	“app activity” (Ganem, Ma, Hansen, Weng)	n/a ⁸	“app activity” (Monsees)
7			SMH or “my history” or Myhistory
8			UDC or “User Data Controls”
9	(a) “activity controls” (Ganem, Ma, Hansen, Weng)	n/a ⁹	(b) “activity controls” (Monsees)
	Google's Total		Plaintiffs' Total

⁵ Numbers in Column 1 of each table correspond to those in the proposed order.

⁶ Certain complex queries return errors in Google's document processing system. For those proposed searches, Google has modified the search which is identified below Plaintiffs' proposal in *(italics)*.

⁷ Google has already employed certain searches over certain custodians' ESI (e.g., stand-alone WAA terms for the non-WAA custodians). Wherever a custodians' name appears (in parentheses) next to a search, this indicates Google has already employed the term for the custodian(s) not identified in parentheses and Google and/or Plaintiffs now propose that Google run the terms over the remaining identified custodian(s).

⁸ Google has already run this search for Ganem, Ma, Hansen, Weng.

⁹ Google has already run this search for Ganem, Ma, Hansen, Weng.

Google Analytics (GA) for Firebase

Terms Google has agreed to run and review, and where responsive, to produce (divided by custodian where applicable):

All custodians:

- “apps using Google Analytics”
- “Google Analytics browser add-on”

Non-Firebase custodian (Monsees)¹⁰:

- Firebase
- “Firebase SDK”
- “Firebase Software Development Kit”
- “Google Analytics for Firebase”
- “GA for Firebase”

Firebase custodians (Ganem, Ma, Weng, Hansen)¹¹:

- (“GA4F” or “GA for Firebase” or “Google Analytics” or scion) /50 benefits
- (“GA4F” or “GA for Firebase” or “Google Analytics” or scion) /50 “data collection”
- (“GA4F” or “GA for Firebase” or “Google Analytics” or scion) /50 “privacy policy”
- (“GA4F” or “GA for Firebase” or “Google Analytics” or scion) /50 consent
- (“GA4F” or “GA for Firebase” or “Google Analytics” or scion) /50 function
- (“GA4F” or “GA for Firebase” or “Google Analytics” or scion) /50 disclos*
- (“GA4F” or “GA for Firebase” or “Google Analytics” or scion) /50 gaia
- (“GA4F” or “GA for Firebase” or “Google Analytics” or scion) /25 plan
- (“GA4F” or “GA for Firebase” or “Google Analytics” or scion) /25 plan
- (“GA4F” or “GA for Firebase” or “Google Analytics” or scion) /10 launch

Disputed Search Term Proposals: None

¹⁰ Google employed these terms for David Monsees who does not have responsibility for any Firebase products.

¹¹ Google employed these terms for custodians whose job responsibilities cover Firebase products, including Steve Ganem (GA for Firebase Product Lead), Francis Ma (Firebase SDK product executive), Edward Weng (AdMob Product Manager, former), and Todd Hansen (Firebase Cloud Messaging software engineer).

Google's Public Representations and Consent Defense

Terms Google has agreed to run and review, and where responsive, to produce:

All custodians:

- “Google Dashboard”
- “Firebase Terms of Service”
- “use policy”
- “what we collect”
- “data we collect”
- “data about app users”
- (safeguard* /2 “your data”)
- “Google Data Collection”
- “to let Google save”
- “must be on”
- “on/off” /5 control
- (“on or off” OR “switch the collection”) AND (WAA” or “WAAH” or “WAAAs” or “sWAA” or “W&AA” or “W&AAs” or “web history” or “WHSH” or (Web pre/2 “App Activity”)) AND NOT (“Location History”)
- apps /3 “use Google services”
- wiretap*
- “non-Google branded”
- “on-device search”
- “Screenwise Trends”

Disputed Search Term Proposals:

No.	Google's Proposal	Plaintiffs' Proposal
	<i>Prior Searches Plus:</i>	
10	(a) (user OR users OR consumer OR consumers OR people) /5 (confus* OR mislead*)	<p>(b) (user* or consumer* or customer* or people*) /10 (confus* or *underst* OR comprehend* OR misle* OR consent OR know OR represent* OR disclos*)</p> <p>(Run as: (user* or consumer* or customer* or people*) /10 (confus* or underst* OR misunderst* OR comprehen* OR misle* OR consent OR know OR represent* OR disclos*))</p>

Google's Public Representations and Consent Defense

11	“new ad control” OR “new ads control” OR “new ads controls” OR “new ad controlling” OR “new ads controlling” OR “new ad controls” OR “new ad controlled” OR “new ads controlled” OR NAC		“New ad* Control*” or NAC (Run as: “new ad control” OR “new ads control” OR “new ads controls” OR “new ad controlling” OR “new ads controlling” OR “new ad controls” OR “new ad controlled” OR “new ads controlled” OR NAC)	
12	(apps /4 “use Google services”)		(apps /4 “use Google services”)	
13			“help center”	
14	“Privacy Policy” (Weng)	n/a ¹²	“Privacy Policy” (Monsees, Ganem, Ma, Hansen)	
15	CFS or “Consent Flow Service” (Weng)	n/a ¹³	CFS or “Consent Flow Service” (Monsees, Ganem, Ma, Hansen)	
16			“consent bump”	
17			N ¹⁴ or N2 or N3	
18	(a) “on or off” OR “switch the collection” (Weng)	n/a ¹⁴	(b) “on or off” OR “switch the collection” (Monsees, Ganem, Ma, Hansen)	
19	(“on or off” OR “switch the collection”) AND (WAA” or “WAAH” or “WAAs” or “sWAA” or “W&AA” or “W&AAs” or “web history” or “WHSW” or (Web pre/2 “App Activity”)) AND NOT (“Location History”) (Ganem, Ma, Monsees, Hansen)	n/a ¹⁵		
Google's Total			Plaintiffs' Total	

¹² Google has already run this search for Weng’s ESI.

¹³ Google has already run this search for Weng’s ESI.

¹⁴ Google has already run this search for Weng’s ESI.

¹⁵ Google has already run this search for all custodians.

Google's Storage and Use of Data

Terms Google has agreed to run and review, and where responsive, to produce:

All custodians:

- correlate /15 (user OR account OR profile)
- Pseudony*
- (shadow or secret or hidden) /2 (profil* or account)
- page_title
- page_referrer
- page_location
- screen_resolution

Disputed Search Term Proposals:

¹⁶ Google has already run this search on Weng's ESI.

¹⁷ Google has already run this search for Hansen and Weng.

¹⁸ Google has already run this search for Weng.

¹⁹ Google has already run this search for Weng.

Google's Storage and Use of Data

34			UUAD OR “Unified user App Data”	[REDACTED]
35			IDFA or ADID	[REDACTED]
36			ID! /5 (app! OR ad! OR device OR instance OR user OR android OR ios) <i>(Run as: (Id OR Ids) /5 (app OR apps OR ad OR ads OR advertising OR advertisement OR device OR instance OR user OR android OR ios))</i>	[REDACTED]
	Google's Total	[REDACTED]	Plaintiffs' Total	[REDACTED]

Other Products (AdMob)

AdMob terms Google has agreed to run and review, and where responsive, to produce:

Ganem:

- AdMob /10 (GA4F or “Google Analytics” or Scion)

Disputed Search Term Proposals:

No.	Google's Proposal	Plaintiffs' Proposal
	<i>Prior Searches Plus:</i>	
37	(a) <u>Ganem, Monsees, Ma, Hansen:</u> AdMob /15 (Gold OR GA4F OR WAA or WAAH or WAAs or sWAA or “W&AA” or “W&AAs” OR “my activity” OR “Google mobile service” OR GMS)	(b) <u>Ganem, Monsees, Ma, Hansen:</u> AdMob AND (Gold OR analytics OR GA4F OR scion OR firebase OR (app*/5 (event OR interact* OR activity OR measure*)) OR appmeasurement OR *WAA* OR “my account” or “my activity” OR perform* OR conversion* OR event OR audience OR FCM OR “cloud messaging” OR “Google mobile service” OR GMS OR Clearcut OR “Google Mobile Platform” OR GMP) ²⁰
38	(a) <u>Weng:</u> AdMob /15 Gold	(b) <u>Weng:</u> AdMob and Gold
39	(a) AdMob /15 (firebase OR ((app or apps or application or applications) /5 (event OR activity OR measure*)) OR appmeasurement OR “Google mobile service” OR GMS)	(b) AdMob /50 (firebase OR scion (app*/5 (event OR interact* OR activity OR measure*)) OR appmeasurement OR perform* OR conversion* OR event OR audience OR “Google mobile service” OR GMS OR Clearcut OR “Google Mobile Platform” OR GMP) ²¹
	Google's (AdMob) Total	Plaintiffs' (AdMob) Total

²⁰ Due to system errors, run as: (AdMob AND (Gold OR analytics OR GA4F OR scion OR firebase OR ((app OR apps OR application OR applications) /5 (event OR interact* OR activity OR measure*)) OR appmeasurement OR WAA OR WAAH OR WAAs OR sWAA OR “W&AA” OR “W&AAs” OR “my account” OR “my activity” OR perform* OR conversion* OR event OR audience OR (FCM OR “cloud messaging”) OR “Google mobile service” OR GMS OR Clearcut OR “Google Mobile Platform” OR GMP)).

²¹ Due to system errors, run as: (AdMob /50 (firebase OR scion OR ((app OR apps OR application or applications) /5 (event OR interact* OR activity OR measure*)) OR appmeasurement OR perform* OR conversion* OR event OR audience OR “Google mobile service” OR GMS OR Clearcut OR “Google Mobile Platform” OR GMP))

Other Products (FCM)

Firebase Cloud Messaging (FCM) terms Google has agreed to run and review, and where responsive, to produce:

Monsees, Ganem, Weng:

- FCM
- “cloud messaging”

Disputed Search Term Proposals:

No.	Google's Proposal	Plaintiffs' Proposal
	<p><i>Prior Searches Plus:</i> <u>Monsees, Ganem, Weng</u> FCM or “cloud messaging” (already run)</p>	<p><i>Prior Searches Plus:</i></p>
40	<p>(a) <u>Ma/Hansen:</u> (FCM or “cloud messaging”) /15 (Gold OR analytics OR GA4F OR firebase OR scion OR (app* /5 (event OR interact* OR activity OR measure*))) OR appmeasurement OR *WAA* OR “my account” or “my activity” OR perform* OR conversion* OR event OR audience OR AdMob OR “Google mobile service” OR GMS OR Clearcut OR “Google Mobile Platform” OR GMP)²²</p>	<p>(b) <u>Ma:</u> (FCM or “cloud messaging”) AND (Gold OR analytics OR GA4F OR firebase OR scion OR (app* /5 (event OR interact* OR activity OR measure*))) OR appmeasurement OR *WAA* OR “my account” or “my activity” OR perform* OR conversion* OR event OR audience OR AdMob OR “Google mobile service” OR GMS OR Clearcut OR “Google Mobile Platform” OR GMP)²²</p> <p>(c) <u>Hansen:</u> (FCM or “cloud messaging”) /10 (Gold OR analytics OR GA4F OR firebase OR scion OR (app* /5 (event OR interact* OR activity OR measure*))) OR appmeasurement OR “my account” or “my activity” OR perform* OR conversion* OR event OR audience OR AdMob OR “Google mobile service” OR GMS OR Clearcut OR “Google Mobile Platform” OR GMP)²³</p>

²² Due to system errors, run as: ((FCM or “cloud messaging”) AND (Gold OR analytics OR GA4F OR firebase OR scion OR ((app or apps or application or applications) /5 (event OR interact* OR activity OR measure*))) OR appmeasurement OR WAA or WAAH or WAAAs or sWAA or “W&AA” or “W&AAs” OR “my account” or “my activity” OR perform* OR conversion* OR event OR audience OR AdMob OR “Google mobile service” OR GMS OR Clearcut OR “Google Mobile Platform” OR GMP))

²³ Due to system errors, run as: (FCM or “cloud messaging”) /10 (Gold OR analytics OR GA4F OR firebase OR scion OR ((app or apps or application or applications) /5 (event OR interact* OR activity OR measure*))) OR appmeasurement OR “my account” or “my activity” OR perform* OR conversion* OR event OR audience OR AdMob OR “Google mobile service” OR GMS OR Clearcut OR “Google Mobile Platform” OR GMP)

Other Products (FCM)

	Google's (FCM) Total	[REDACTED]	Plaintiffs' (FCM) Total	[REDACTED]
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Other Products (RTB, App Indexing, GMS)

Terms Google has agreed to run and review, and where responsive, to produce:

All custodians:

- (“Real Time” /10 (bid OR bids OR bidding))
- RTB
- product* AND integrate* AND “third-party apps”

Disputed Search Term Proposals:

No.	Google's Proposal	Plaintiffs' Proposal
	Prior Searches Plus:	Prior Searches Plus:
41	(“real time” /20 bid*) OR RTB	“Real Time” /s bid* OR RTB (Run as: (“real time” /20 bid*) OR RTB”)
42	“App Indexing” /50 (“my account” OR “my activity” OR (“WAA*” OR “sWAA”))	“App Indexing” /50 (“my account” or “my activity” OR *WAA*) (Run as: “App Indexing” /50 (“my account” OR “my activity” OR WAA* or “sWAA”))
43	(a) <u>All custodians:</u> (“Google Mobile Service” OR GMS) /25 (Gold OR analytics OR GA4F OR firebase) AND (log* OR user /2 data OR measurement)	(b) <u>Ganem:</u> (Analytics OR firebase OR GA4F OR Scion OR “Google Mobile Platform” OR GMP) AND (Gold OR app! /5 (event OR interact! OR activity OR measure!)) OR !WAA! OR “my account” OR “my activity” OR perform! OR conversion! OR event OR audience OR AdMob OR FCM OR “Cloud Messaging” OR appmeasurement OR “Google mobile service” OR GMS OR Clearcut) ²⁴

²⁴ Due to system errors, run as: ((Analytics OR firebase OR GA4F OR Scion OR “Google Mobile Platform” OR GMP) AND (Gold OR App OR apps OR application OR applications) /5 ((event OR interact* OR activity OR measure*) OR WAA or WAAH or WAAs or sWAA or “W&AA” or “W&AAs” OR “my account” OR “my activity” OR perform* OR conversion* OR event OR audience OR AdMob OR FCM OR “Cloud Messaging” OR appmeasurement OR “Google mobile service” OR GMS OR Clearcut))

Other Products (RTB, App Indexing, GMS)

			(c) <u>Ma/Monsees/Hansen/Weng</u> : ("Google Mobile Service" OR GMS OR Clearcut) /10 Gold OR analytics OR GA4F OR firebase OR scion OR "Google Mobile Platform" OR GMP OR (app! /5 (event OR interact! OR activity OR measure!)) OR appmeasurement OR !WAA! OR "my account" or "my activity" OR perform! OR conversion! OR event OR audience OR FCM OR "cloud messaging" or AdMob OR Clearcut) ²⁵	16,035
Google's Total		██████████	Plaintiffs' Total	██████████

²⁵ Due to system errors, run as: (“Google Mobile Service” OR GMS OR Clearcut) /10 (Gold OR analytics OR GA4F OR firebase OR scion OR “Google Mobile Platform” OR GMP OR ((app or apps or application or applications) /5 (event OR interact* OR activity OR measure*)) OR appmeasurement OR WAA or WAAH or WAAs or sWAA or “W&AA” or “W&AAs” OR “my account” OR “my activity” OR perform* OR conversion* OR event OR audience OR FCM OR “cloud messaging” or AdMob OR Clearcut)